

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MEDIA MATTERS FOR AMERICA, *et al.*,

Plaintiffs,

v.

WARREN KENNETH PAXTON JR., in his
official capacity as Attorney General of the
State of Texas,

Defendant.

CIV. NO. 23-3363

[PROPOSED] TEMPORARY RESTRAINING ORDER

On December 11, 2023, Plaintiffs Media Matters for America (“Media Matters”) and Eric Hananoki filed a motion for a temporary restraining order and preliminary injunction. After considering the arguments and papers submitted, the Court **GRANTS** the motion and enters the following Temporary Restraining Order:

ORDERED that Warren Kenneth Paxton, Jr., Attorney General of the State of Texas, together with his agents, employees, attorneys, and all persons in active concert or participation with them who receive actual notice of the injunction (collectively “Defendant Paxton”), is enjoined from enforcing the Civil Investigative Demand served by Attorney General Paxton to Media Matters on December 1, 2023;

ORDERED that Defendant Paxton is enjoined from further subjecting Plaintiffs to any legal process in Texas, including but not limited to any proceeding intended to enforce the December 1, 2023 Civil Investigative Demand, arising from Plaintiffs’ research and reporting on the social media platform known as X and on Elon Musk;

ORDERED that Defendant Paxton is enjoined from further investigating Plaintiffs in retaliation for their research and reporting on the social media platform X and Elon Musk;

This order and all supporting pleadings and opposing papers must be served on the adverse party within ____ days.

Defendant is **FURTHERED ORDERED** to show cause on _____, at _____ before this Court as to why a preliminary injunction to the same effect should not issue.

This order shall remain in effect until _____.

IT IS SO ORDERED.

Dated: _____

United States District Judge,
District of Maryland

CERTIFICATE OF SERVICE

I hereby certify that this document will be served on the Defendant in accordance with Fed.

R. Civ. P. 5(a).

Dated: December 11, 2023

Respectfully submitted,
/s/ Tina Meng Morrison

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**Pro hac vice* application forthcoming

**Application for admission pending

Counsel for Plaintiffs Media Matters for America and Eric Hananoki